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Business Continuity Disclosure

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ITG Inc. and its affiliates (“ITG” or the “firm”) are committed to providing excellence in their services and products. To ensure the continued delivery of these services, ITG maintains a fully comprehensive business continuity program (“BCP”). This program has been designed to provide strategic planning and tactical support after an event to: (1) ensure rapid recovery of services and products to minimize the impact to ITG’s clients, reputation, and operating efficiency; (2) minimize the impact to ITG’s staff and ensure their safety; and (3) provide crisis management communication support.

THE BUSINESS CONTINUITY PROGRAM

ITG has taken a global approach to protecting against business disruptions. The BCP is owned by the Chief Information Security Officer (CISO), who reports directly to the ITG Operating Committee for BCP matters. The program is overseen by senior executives from ITG’s offices in North America, Europe and Asia-Pacific. In addition, ITG has a global team of professionals that assist with the training, education, development, implementation and maintenance associated with this program. These individuals also assist by continuously monitoring the firm’s preparedness through periodic testing and by providing feedback. Our plans also leverage both regional and global resources, such that an ITG employee can work from any ITG facility, dedicated recovery site or flexible workspace (temporary offices or home) with minimal restrictions.

There are three main components to the ITG BCP: (1) Crisis Management; (2) Business Recovery; and (3) Systems and Data Recovery.

1. Crisis Management

In the moments following an event (or before a known upcoming event, such as a storm), ITG’s Crisis Management Team (“CMT”) meets to address its approach based on the type of event. ITG’s crisis management actions are structured into time-phases. Each phase includes specific actions and roles and responsibilities for teams and/or individuals. These action categories include, but are not limited to, the following:

- **Communications** – Establishing both internal and external communication plans. These plans include scheduling periodic CMT status calls, communication with employees via the Emergency Notification System or emergency hotline, attending status calls with



local authorities, vendors/providers and/or regulators, and the handling of external inquiries from clients, family members and/or the media.

- **Recovery Locations** – Determining which ITG facilities, dedicated spaces, and/or flexible workspace arrangements will be required, and in which geographical region(s), if needed. This may also include establishing a command center to allow for continuous incident monitoring to coordinate response efforts.

These actions are periodically tested through tabletop drills and live exercises, which allow the CMT to practice and improve the overall crisis management process.

2. Business Recovery

Business Recovery ensures the rapid recovery of services and products to minimize the impact to ITG's clients, reputation, and operating efficiency. In the event of a disaster, the focus of the company will shift from the current structure and function of business-as-usual to the structure and function of an organization working towards survival and the resumption of business operations. Each functional department and/or business unit has a Business Recovery Plan ("BRP"). The BRPs have recovery actions in the immediate aftermath of an incident to restore critical operations or facilities of ITG, as well as requirements for specific applications, recovery sites, and team contacts. These requirements have been determined by business impact analyses performed for each critical business unit.

Close coordination will be maintained with the CMT, ITG Operating Committee, and any other recovery team on which they depend throughout the resumption and recovery operations. The BRPs are periodically tested through tabletop drills and live exercises, which allow the teams to practice and improve their business recovery process.

3. Systems and Data Recovery

Technology-driven operations can continue to run indefinitely, provided that staff can access the off-site data centers for general operational maintenance. To mitigate the risk of operational outages, ITG has taken reasonable precautions at its offices through uninterruptible power supply systems and, where viable, generators. To ensure resilience and protection of its systems and data, ITG has dual off-site data centers that are managed by third-party vendors located in alternate locations. Regular tests are performed to provide reasonable assurance that systems have the ability to failover between data centers, and that backup data can be recovered, if required. Periodic assessments for mission-critical systems are performed.

SIGNIFICANT BUSINESS DISRUPTIONS (SBDs)

ITG's BCP addresses both internal and external Significant Business Disruptions ("SBDs"). Internal SBDs affect only the firm's ability to communicate and do business, such as any event that denies ITG access to the premises. External SBDs prevent the operation of the securities markets or a number of firms, such



as a regional power outage, floods, terrorist attack, or wide-scale regional disruption. In this scenario, ITG's response relies more heavily on market conditions and systemic risks associated with such a catastrophe.

UNDERSTANDING & MITIGATING RISK

As history has shown, SBDs can vary in type and duration, and almost always include some level of unpredictability. While no contingency plan can be considered failsafe, ITG's BCP has undergone significant enhancements over the years to provide reasonable assurance that the firm will be able to adapt to unforeseen circumstances. As a firm, ITG continuously reassesses its operational and financial risks, as well as remains current with various business requirements (internal, external, regulatory, etc.). Through liaising with public, private and government organizations and agencies, ITG makes a continuous effort to stay aware of upcoming threats and risks, as well as new technology and strategies that can assist with crisis management, and business and system/data recovery.

COMMUNICATION

ITG discloses in writing to its customers a summary of its BCP upon account opening and annually. Furthermore, the summary is available on the ITG website (<http://www.itg.com>) and ITG will provide a summary of its BCP to customers upon request. In the event of a significant business disruption, clients can visit the ITG website for additional information.

This disclosure has been created to satisfy FINRA Rule 4370, requiring the creation and maintenance of business continuity plans appropriate to the scale and scope of ITG's businesses.

Approved by:

Thomas Shpetner

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